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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

SAI KEUNG TIN,
also known as “SK TIN,”
“RICKY TIN,”
“JI YEARLONG,” and
“LAM YUK KI,”

Defendant.

REMOVAL TO THE
CENTRAL DISTRICT OF
CALIFORNIA

(Fed. R. Crim. P. 5)

Case No. 24-MJ-171

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EASTERN DISTRICT OF NEW YORK, SS:

Ryan Bessey, being duly sworn, deposes and states that he is a Special Agent with the United State Fish and Wildlife Service (“USFWS”), duly appointed according to law and acting as such.

On or about February 25, 2024, the United States District Court for the Central District of California issued a warrant for the arrest of the defendant SAI KEUNG TIN, also known as “SK Tin,” “Ricky Tin,” “Ji Yearlong,” and “Lam Yuk Ki” for violating Title 18, United States Code, Section 554 (causing the smuggling of goods from the United States).

The source of your deponent’s information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On or about February 25, 2024, a criminal complaint was signed by United States Magistrate Judge Karen Stevenson in the Central District of California (the “Complaint”) charging the defendant SAI KEUNG TIN with violating Title 18, United States Code, Section 554 (causing the smuggling of goods from the United States). A true and correct copy of the Complaint is attached as Exhibit A.

2. In connection with the Complaint, on or about February 25, 2024, the United States District Court for the Central District of California issued a warrant (the “Warrant”) for the arrest of the defendant SAI KEUNG TIN. A true and correct copy of the Warrant is attached as Exhibit B.

3. On or about February 25, 2024, SAI KEUNG TIN traveled to John F. Kennedy International Airport (“JFK”) in Queens, New York from Hong Kong and was arrested by the USFWS at secondary border screening area pursuant to the Warrant.

4. At the time of his arrest on February 25, 2024, SAI KEUNG TIN acknowledged his full name to the USFWS, which matched the name listed on the arrest warrant. SAI KEUNG TIN’s passport contained the same name and date of birth of those of the SAI KEUNG TIN wanted in the Central District of California. Law enforcement agents also compared the physical appearance of SAI KEUNG TIN to a photograph of SAI KEUNG TIN in the file prepared by law enforcement agents that depicts the person who is wanted in the Central District of California and observed that SAI KEUNG TIN appeared to be the same person depicted in this photograph.

5. Based on the foregoing, I submit that there is probable cause to believe that the defendant is the SAI KEUNG TIN wanted in the Central District of California.

WHEREFORE, your deponent respectfully requests that the defendant SAI KEUNG TIN be removed to the Central District of California so that he may be dealt with according to law.

S/ Ryan Bessey

Ryan Bessey
Special Agent
United State Fish and Wildlife Service

Sworn to before me this
26th day of February, 2024

S/ Cheryl Pollak

THE HONORABLE CHERYL L. POLLAK
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

EXHIBIT A

UNITED STATES DISTRICT COURT

for the

Central District of California

United States of America)

v.)

SAI KEUNG TIN,) Case No.

also known as "SK Tin," also known as "Ricky Tin,")

also known as "Ji Yearlong," also known as "Lam)

Yuk Ki,")

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 27, 2023 in the county of Los Angeles in the
Central District of California, the defendant(s) violated:

Code Section

18 U.S.C. § 554

Offense Description

Causing the Smuggling of Goods From the United States

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet./s/ Ryan Bessey*Complainant's signature*Ryan Bessey, Special Agent, U.S. Fish & Wildlife*Printed name and title*

Sworn to before me and signed in my presence.

Date: 02/25/2024*Judge's signature*City and state: Los Angeles, CaliforniaThe Honorable Karen Stevenson*Printed name and title*

AFFIDAVIT

I, Ryan Bessey, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Sai Keung Tin, also known as "SK Tin," "Ricky Tin," "Ji Yearlong," and "Lam Yuk Ki" ("TIN") for a violation of 18 U.S.C. §§ 554, 2(b) (causing the smuggling goods from the United States) (the "Subject Offense").

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all of my knowledge of the investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only and all dates and times are approximate.

II. BACKGROUND OF AFFIANT

3. I am a Special Agent with the United States Fish and Wildlife Service ("USFWS"), Office of Law Enforcement, Department of the Interior. I am currently assigned as a Special Agent in Buffalo, New York, where I investigate violations of federal wildlife laws. I am a Federal Law Enforcement Officer within the meaning of Rule 41(a) of the Federal Rules of Criminal Procedure. I have been a Special

Agent of USFWS since July 2010; prior to becoming a Special Agent, I worked as a uniformed Wildlife Inspector with USFWS for four years, covering John F. Kennedy International Airport ("JFK Airport"). I hold a dual bachelor's degree from Mercyhurst University in Criminal Justice and Sociology with a concentration in law enforcement. I am a graduate of the Criminal Investigator Training Program, USFWS Special Agent Basic School, and Wildlife Inspector Basic School at the Federal Law Enforcement Training Center in Glynco, Georgia.

4. I have received specialized training and possess experience in the enforcement of federal wildlife laws, including Smuggling and the Lacey Act, Title 16, United States Code, Section 3371 et seq., which criminalizes selling or transporting wildlife in international commerce. I am further trained in the identification of fish and wildlife species, including eastern box turtles. I have participated in numerous federal investigations, either as a case agent or in various support roles, including investigations involving the unlawful capturing, taking, transporting, possession, and sale of fish and wildlife.

III. SUMMARY OF PROBABLE CAUSE

5. Between June 2017 and December 2018, Kang Juntao ("Kang") smuggled at least 1,500 turtles from the United States to Hong Kong. Kang pleaded guilty to a federal money laundering charge related to this conduct in Camden, New Jersey, following his extradition from Malaysia in 2019.

6. From approximately August 2017 through November 2018, Kang directed middlemen to ship approximately 46 packages containing turtles from cities and neighborhoods in New York and New Jersey, which were routed through an International Mail Facility located at JFK Airport in Queens, New York, to TIN and aliases associated with TIN at Room 705, No-7, San Lau Street, Cheong Shing Court, Hung Hom, Hong Kong (the "Target Address") and other addresses in Hong Kong that were used to receive smuggled turtle parcels in TIN's name and the names of aliases associated with TIN.

7. On June 27, 2023, wildlife inspectors at the International Mail Facility in Torrance, California, intercepted four packages addressed to "Ji Yearlong," an alias believed to be associated with TIN, at TIN's home address, the Target Address. Each of these packages contained eastern box turtles, which are regulated by the Convention on International Trade in Endangered Species of Wild Flora and Fauna ("CITES"), and each package was falsely labeled as containing almonds or chocolate cookies. Wildlife inspectors also searched property records and learned that the name listed as the sender on each of these packages was not in fact associated with the listed sender address and was thus likely fictitious.

8. On February 25, 2024, TIN admitted to me in a voluntary, recorded interview that he lives at the Target Address with his wife. I also manually searched TIN's two cell phones, one of which revealed a conversation wherein two individuals discussed the risk of law enforcement intercepting

parcels containing turtles. Further, the phone number associated with one of TIN's two phones that I reviewed is the same phone number listed on packages of turtles sent from cities and neighborhoods in New York and New Jersey to the Target Address in 2018.

9. Based on the above, and as described in further detail below, there is probable cause to believe that TIN committed the Subject Offense, i.e., on or about June 27, 2023, within the Central District of California and elsewhere, TIN, together with others, knowingly caused to be exported and sent from the United States to Hong Kong, merchandise, namely, eastern box turtles, contrary to U.S. law, in that he did not obtain CITES permits, did not possess an import/export license, and did not declare the merchandise to an official of the United States government upon the shipment of the turtles from the United States, in violation of 18 U.S.C. §§ 554, 2(b), 16 U.S.C. §§703 and 1538; and 50, C.F.R. §§ 14, 21, and 23.

VI. LEGAL BACKGROUND

10. CITES was an international agreement among approximately 181 governments, including the United States, the People's Republic of China, and the Hong Kong Administrative District, to protect fish, wildlife, and plants that are, or may become, threatened with extinction. CITES established import and export restrictions to protect these species from overexploitation through international trade. The restrictions applied to live or dead wildlife specimens, as well as the

skins, parts, and products made in whole or in part from a listed species.

11. Under CITES, species were protected according to a classification system known as "Appendices I, II, and III." Appendix I consisted of species threatened with extinction which were or may have been affected by trade. Appendix II of CITES consisted of the species that were not presently threatened with extinction but could have become threatened if trade in the species was not regulated. International trade in species listed in these appendices was monitored and regulated by permits and quotas.

12. The United States implemented CITES through the Endangered Species Act ("ESA"), Title 16, United States Code, Section 1531 et seq. The ESA and its implementing regulations made it unlawful for anyone to engage in trade in any specimens contrary to CITES or to possess any specimens traded contrary to CITES. 16 U.S.C. § 1538(c)(1).

13. Prior to export from the United States, all shipments of CITES Appendix II wildlife were required to have a valid CITES export or re-export permit issued by the United States CITES Management Authority. 50 C.F.R. § 23.20. International trade in a CITES-listed specimen without the required documentation was prohibited. 50 C.F.R. § 23.13(a).

14. Under Title 50 of the Code of Federal Regulations, exporters and their agents were required to declare any importation of wildlife from the United States on a Declaration for Importation or Exportation of Wildlife. 50 C.F.R. § 14.61.

Exporters and their agents were further required to obtain clearance from an officer of the U.S. Fish and Wildlife Service ("USFWS") for any exportation of wildlife and to make all relevant shipping documents, permits, and the wildlife itself available to an officer of the USFWS. 50 C.F.R. § 14.52. Exporters and their agents were further required to mark any exportation of wildlife with an accurate list of each species' scientific name. 50 C.F.R. § 14.81.

VII. STATEMENT OF PROBABLE CAUSE

15. Based on my review of law enforcement reports, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

A. Eastern Box Turtles Are Regulated by CITES

16. The eastern box turtle (*Terrapene carolina carolina*) is a subspecies of the common box turtle (*Terrapene carolina*). The eastern box turtle is native to forested regions of the eastern United States with some isolated populations in the Midwest. The turtles typically reach a length up to six inches and can live more than 100 years. The turtles have a domed carapace, which can display radiated lines or spots. Turtles with colorful markings are particularly prized in the domestic and foreign pet trade market, particularly in China and Hong Kong.

17. All turtles in the genus *Terrapene*, which includes the eastern box turtle has been listed in Appendix II of CITES since February 16, 1995.

B. Between June 2017 and December 2018, TIN Received Shipments of Eastern Box Turtles at His Hong Kong Address

18. In 2017, the U.S. Fish and Wildlife Service conducted an investigation into Kang, a Chinese citizen located in Hangzhou City, China. Kang recruited turtle poachers and suppliers in the United States to ship turtles domestically to middlemen. Those middlemen would in turn bundle the turtles into other packages and export them to Hong Kong. The turtles were bound in socks to protect their shells and so they could not move and alert authorities. Between June 2017 and December 2018, Kang smuggled at least 1,500 turtles from the United States to Hong Kong with a market value of over \$2,250,000 in the illegal pet trade. Kang pleaded guilty to a federal money laundering charge in Camden, New Jersey, in Case No. 1:10-CR-00107-RMB, following his extradition from Malaysia in 2019.

19. Kang instructed middlemen to ship turtles to Hong Kong, where it was easier to smuggle turtles into mainland China. Kang instructed shippers to ship the turtles to the Target Address. Kang also instructed shippers to address these packages to the following recipients: Sai Keung Tin, SK Tin, Ricky Tin, Ji Yearlong, and Lam Yuk Ki.¹ From approximately August 2017 through November 2018, Kang directed middlemen to ship approximately 46 packages containing turtles from cities

¹ Based on my training and experience, and TIN's admission to me today, February 25, 2024, that no adults other than him and his wife live at his home, the Target Address, I believe "Ji Yearlong" and "Lam Yuk Ki" are TIN's aliases that he uses on parcels containing illegal wildlife shipments for the purpose of avoiding law enforcement.

and neighborhoods in New York and New Jersey, which were routed through an International Mail Facility located at JFK Airport in Queens, New York, to the above-referenced recipients at the Target Address or other addresses in Hong Kong that were used to receive smuggled turtle parcels in TIN's name.

20. Since Kang's arrest and prosecution, wildlife inspectors at the International Mail Facility in Torrance, California, have continued to intercept packages addressed to TIN and others at the Target Address. For example, on June 27, 2023, wildlife inspectors at the International Mail Facility in Torrance, California, intercepted four packages addressed to Ji Yearlong at the Target Address. Three of these packages contained between eight and 12 live eastern box turtles each. The fourth package contained seven live eastern box turtles and one deceased eastern box turtle. The turtles were all bound in socks. The packages were falsely labeled as containing almonds or chocolate cookies. Wildlife inspectors also searched property records and learned that the name listed as the sender on each of these packages was not in fact associated with the listed sender address, and thus fictitious.

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21. Images of one of these four packages intercepted on June 27, 2023, that was addressed to TIN's home, the Target Address, are depicted below:



22. A review of postal records from June 2021 to June 2023 indicated that approximately 45 other packages were shipped from cities and neighborhoods in the Central District of California and routed to the Target Address via the International Mail Facility located in Torrance, California. Based on my review of property records related to the sender addresses associated with these packages, none of the sender names listed on the packages appear to be associated with their respective sender addresses.

The sender names thus appear to be fictitious. Based on my training and experience, individuals who illegally export wildlife often use fictitious sender names on shipments containing wildlife to avoid detection by law enforcement. About 30 of the 45 packages described above listed TIN or one of his aliases as the recipient. The remaining packages listed Ji Yearlong, Lam Yuk Ki, or Yan Ji as recipients.

23. USFWS searched for any CITES permits, import/export licenses in the shippers' names, and wildlife declarations and found none that correspond to any of the shipments sent to the Target Address, including those listing the recipient as TIN.

C. TIN Arrives at John F. Kennedy International Airport in Queens, New York on February 25, 2024

24. On February 25, 2024, TIN arrived at JFK Airport in Queens, New York, from Hong Kong. USFWS agents received an alert that TIN was traveling to the United States. TIN entered the customs area of the JFK airport after arriving, and Customs and Border Protection ("CBP") agents then directed TIN to a secondary screening. TIN agreed to speak with me and provided me with the passcodes for his two cell phones ("Phone #1" and "Phone #2"). My encounter with TIN was audio recorded. TIN told me that Phone #1, with number 6228-6128, was his personal phone that he has used for many years. The phone number for Phone #1 is the same phone number listed on packages exported from cities and neighborhoods in New York and New Jersey to the Target Address in 2018. I reviewed the contents of Phone #1 and learned that TIN, using Phone #1, had a conversation with an

individual whose saved profile picture was a diamondback terrapin hatchling, another turtle species frequently trafficked from the United States to Hong Kong. Based on my training and experience, illegal turtle trade suppliers frequently attach turtle profile pictures to their social media accounts.

25. I also reviewed the contents of Phone #2. The call log on Phone #2 showed that a call was placed from Phone #2 to Phone #1 on February 24, 2024. This call log also showed incoming calls on February 24, 2024, from a phone number which appear to have originated from Hong Kong. Phone #2 also had hundreds of photographs of turtles, most of which were eastern box turtles. These photographs were saved under a Google account associated with email address RickyMartinMartin19@gmail.com.

26. Phone #2 also contained a screenshot of a conversation between two individuals where the two individuals appear to be discussing the risk of law enforcement seizing international turtle shipments, and how a refund would be given to the buyer if the turtle shipment was seized by law enforcement or if any of the turtles died during the shipment process. One of the participants of this conversation was identified as Emagnuk Citoxe. I reviewed Citoxe's Facebook profile, which was linked to the above-referenced conversation and discovered that Citoxe has at least 30 Facebook "friends," with connections to turtles and other reptiles. Further, while TIN was in the customs area at JFK Airport, Phone #2 had an incoming call from area code 530 in northeastern California.

27. During my recorded interview of TIN, TIN stated that he also goes by Ricky Tin. He admitted that he lives at the Target Address with his wife and no other adults. He stated he created the Gmail account RickyMartinMartin19@gmail.com a few days ago, before traveling to the United States on February 25, 2024. TIN also stated that he bought Phone #2 from a secondhand market in Hong Kong approximately one week before his arrival in the United States and did not know what was on it or its phone number. TIN also said that he did not know anyone in New York or California and planned to travel to Los Angeles or Texas after spending two days in New York City.

VIII. CONCLUSION

28. For all of the reasons described above, there is probable cause to believe that TIN committed the Subject Offense.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 25th day of
February, 2024.

Karen Stevenson

THE HONORABLE KAREN STEVENSON
UNITED STATES MAGISTRATE JUDGE

EXHIBIT B

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,
PLAINTIFF,

v.

SAI KEUNG TIN,
also known as "SK Tin,"
also known as "Ricky Tin,"
also known as "Ji Yearlong,"
also known as "Lam Yuk Ki,"

DEFENDANT

WARRANT FOR ARREST

ON COMPLAINT

CASE NO.: _____

To: UNITED STATES MARSHAL AND ANY AUTHORIZED UNITED STATES OFFICER

YOU ARE HEREBY COMMANDED to arrest **SAI KEUNG TIN, also known as "SK Tin," also known as "Ricky Tin," also known as "Ji Yearlong," also known as "Lam Yuk Ki,"** and bring him/her forthwith to the nearest Magistrate Judge to answer a complaint charging him/her with Causing the Smuggling of Goods From the United States, in violation of Title 18, United States Code, Section 554.

REC: BY AUSA [Detention]

February 25, 2024

2/25/2023 9:18 pm

Date

Hon. Karen L> Stevenson

The Honorable Karen Stevenson

Karen Stevenson

Signature of Magistrate Judge

RETURN

This warrant was received and executed with the arrest of the above-named defendant at (location):

DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER

SIGNATURE OF ARRESTING OFFICER

DATE OF ARREST

DESCRIPTIVE INFORMATION FOR DEFENDANT CONTAINED ON PAGE TWO

WARRANT FOR ARREST ON COMPLAINT

Page 1 of 2

ADDITIONAL DEFENDANT INFORMATION

RACE:	SEX:	HEIGHT:	WEIGHT:	HAIR:	EYES:	OTHER:	
DATE OF BIRTH: [REDACTED]		PLACE OF BIRTH:		SOCIAL SECURITY NO.:		DRIVER'S LICENSE NO. ISSUING STATE	
ALIASES:		SCARS, TATTOOS OR OTHER DISTINGUISHING MARKS:					
AUTO YEAR:	AUTO MAKE:	AUTO MODEL:		AUTO COLOR:		AUTO LICENSE NO. ISSUING STATE	
LAST KNOWN RESIDENCE:				LAST KNOWN EMPLOYMENT:			
FBI NUMBER:							
ADDITIONAL INFORMATION:							
INVESTIGATIVE AGENCY NAME:				INVESTIGATIVE AGENCY ADDRESS:			
NOTES:							